

Kristol Bradley Ginapp, Esq.
Nevada Bar No. 8468
Jonathan W. Fountain, Esq.
Nevada Bar No. 10351
HOWARD & HOWARD ATTORNEYS PLLC
3800 Howard Hughes, Suite 1000
Las Vegas, Nevada 89169
Telephone: 702-257-1483
Email: kgb@h2law.com
Email: jwf@h2law.com
Attorneys for Defendants
Natural Life, Inc. d/b/a Heart and Weight Institute and
Konstantine Stoyanov

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

NATIONAL LABOR RELATIONS BOARD,

Plaintiff,

v.

NATURAL LIFE, INC. d/b/a HEART
AND WEIGHT INSTITUTE and
KONSTANTINE STOYANOV,

Defendants.

Case No.: 2:24-cv-01802-JCM-EJY

**STIPULATION AND ORDER
FOR EXTENSION OF TIME FOR
PLAINTIFF TO FILE ITS REPLY IN
SUPPORT OF ITS MOTION TO DISMISS**

(Second Request)

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and Local Rule IA 6-1, Defendants Natural Life, Inc. d/b/a Heart and Weight Institute (“Natural Life”) and Konstantine Stoyanov (“Stoyanov”) (collectively, the “Defendants”), and Plaintiff National Labor Relations Board (“Plaintiff” or “NLRB”) hereby agree and stipulate to extend the time for Defendants to file and serve their reply in support of their motion to dismiss, filed on November 4, 2024. This is Defendants’ second request for an extension of time. In support of Defendants’ request, the parties state as follows:

1. On September 25, 2024, the NLRB filed a Complaint pursuant to the Federal Priority Statute (ECF No. 1) alleging that Defendants transferred assets to third parties before paying a debt owed to the United States. *Id.*

2. Defendants filed a motion to dismiss the Complaint on November 4, 2024 (ECF No. 8), making the NLRB’s deadline to file and serve its opposition November 18, 2024.

3. The NLRB requested and Defendants granted, an extension of time for the NLRB

1 to file and serve its opposition to the motion from November 18, 2024, to November 25 ,2024.
 2 (ECF No. 17.) At the same time, in light of the Thanksgiving holiday, Defendants requested and
 3 the NLRB granted, an extension of time for Defendants to file and serve their reply in support of
 4 their motion to dismiss, from December 2, 2024, to December 9, 2024. (*Id.*)

5 4. Defendants now request a second extension of time to file and serve their reply in
 6 support of their motion to dismiss, from December 9, 2024, to December 16, 2024, due to the
 7 prolonged illness of Defendants' counsel, Jonathan W. Fountain, during the week of December 2,
 8 2024.

9 5. The parties agree that the foregoing constitutes good cause for the requested 1-
 10 week extension of time.

11 **IT IS SO AGREED AND STIPULATED:**

12 HOWARD & HOWARD ATTORNEYS PLLC

NATIONAL LABOR RELATIONS BOARD

13 By: /s/ Jonathan W. Fountain
 14 Kristol Bradley Ginapp, Esq.
 15 Nevada Bar No. 8468
 16 Jonathan W. Fountain, Esq.
 17 Nevada Bar No. 10351
 18 3800 Howard Hughes, Suite 1000
 19 Las Vegas, Nevada 89169
 20 Telephone: 702-257-1483
 21 Email: kgb@h2law.com
 22 Email: jwf@h2law.com

By: /s/ Pia Winston
 Pia Winston, Esq.
 Dalford Dean Owens, Jr., Esq.
 1015 Half Street S.E., Fourth Floor
 Washington, D.C. 20003
 Telephone: 202-273-0111
 Email: pia.winston@nlrb.gov
 Email: dean.owens@nlrb.org

Attorneys for Defendants
Natural Life, Inc. d/b/a Heart and Weight
Institute and Konstantine Stoyanov

Attorneys for Plaintiff
National Labor Relations Board

23 **IT IS SO ORDERED:**

24 
 25 UNITED STATES DISTRICT JUDGE

26 DATED: December 11 2024
 27
 28